

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|------------------------------------|---|--------------|
| CEMENT MASONS' UNION LOCAL NO. 592 | : | CIVIL ACTION |
| PENSION FUND, et al. | : | |
| | : | |
| Plaintiffs | : | |
| | : | |
| v. | : | |
| | : | |
| CORRENTI CONSTRUCTION CORPORATION | : | |
| | : | |
| Defendant | : | NO. 02-01424 |

**REQUEST TO CLERK TO ENTER DEFAULT
PURSUANT TO FED. R. CIV. PRO. 55(a)**

TO: Michael E. Kunz, Clerk
United States District Court for the
Eastern District of Pennsylvania
U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

You will please enter a default on Defendant, Correnti Construction Corporation for failure to plead or otherwise defend as provided in Rule 55(a) of the Federal Rules of Civil Procedure as appears in the attached affidavit of Marc L. Gelman, Esquire.

Respectfully submitted,

JENNINGS SIGMOND

BY: s/ Marc L. Gelman
SANFORD G. ROSENTHAL (ID.NO. 38991)
MARC L. GELMAN (ID.NO.78857)
The Penn Mutual Towers, 16th Fl.
510 Walnut Street, Independence Square
Philadelphia, PA 19106-3683
(215) 351-0623/0611
Attorneys for Plaintiffs

Date: September 9, 2002

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| CORRENTI CONSTRUCTION CORPORATION | : | |
| | : | |
| Defendant | : | NO. 02-01424 |

**AFFIDAVIT OF MARC L. GELMAN, ESQUIRE
FOR ENTRY OF DEFAULT**

| | |
|-------------------------------------|------|
| COMMONWEALTH OF PENNSYLVANIA | : |
| | : SS |
| COUNTY OF PHILADELPHIA | : |

Marc L. Gelman, having been first duly sworn according to law, hereby deposes and states as follows:

I am the attorney for the Plaintiffs in the above-entitled action.

The Complaint and Summons in this action were served on the Defendant, Correnti Construction Company by Gerald Taylor on August 7, 2002 as appears from the Return of Service, which has been duly docketed with the Court on August 23, 2002. The time in which the Defendant may answer or otherwise move as to the Complaint has expired.

The Defendant has not answered or otherwise moved and the time for Defendant to answer or otherwise move has not been extended.

The Defendant is not an infant or incompetent person and is not in the military service.

s/ Marc L. Gelman

MARC L. GELMAN, ESQUIRE

Sworn to and subscribed
before me this day of September, 2002

NOTARY PUBLIC

CERTIFICATE OF SERVICE

I, Marc L. Gelman, ESQUIRE, state, under penalty of perjury, that the foregoing Request to Clerk to Enter Default Pursuant to Fed. R. Civ. Pro. 55(a) was served by mailing same first class mail, postage prepaid, on the date listed below to:

Correnti Construction Company
100 Mill Street
Clifton Heights, PA 19018

s/ Marc L. Gelman
MARC L. GELMAN, ESQUIRE

DATE: September 9, 2002

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